

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

MARSHA TALTON

Plaintiff,

v.

GENERAL MOTORS LLC,

Defendant.

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Civil Action No. 6:19-cv-23

JOINT STIPULATION OF DISMISSAL WITH PREJUDICE

Plaintiff Marsha Talton (“Plaintiff”) and Defendant General Motors LLC (“Defendant”), by and through undersigned counsel, and pursuant to Rule 41 of the Federal Rules of Civil Procedure, hereby stipulate to a dismissal of this action with prejudice.

I.

1. Plaintiff now moves to dismiss this suit with prejudice to re-filing.
2. Defendant, which has filed an Answer, agrees to the dismissal.
3. This case is not a class action, and a receiver has not been appointed.
4. This case is not governed by any federal statute that requires a court order for dismissal of the case.
5. This dismissal is with prejudice as to re-filing.
6. Each side is to bear its own costs and attorneys’ fees.
7. Pursuant to the terms of Rule 41(a)(1)(A)(ii), this case is dismissed with prejudice upon filing of this joint stipulation.

8. Accordingly, Plaintiff and Defendant jointly stipulate the Court may dismiss with prejudice all claims that Plaintiff asserted or could have asserted against Defendant in this lawsuit and that all costs of court incurred in connection with said causes of action are to be paid by the party incurring same.

Dated: April 13, 2020.

Respectfully submitted,

DYKEMA GOSSETT PLLC

/s Deron L. Wade

DERON L. WADE

State Bar No. 24008220

E-Mail: dwade@dykema.com

CLAY A. COSSÈ

State Bar No. 24071246

E-Mail: ccosse@dykema.com

1717 Main Street, Suite 4200

Dallas, Texas 75201

Telephone: (214) 462-6400

Fax: (214) 462-6401

**ATTORNEYS FOR DEFENDANT
GENERAL MOTORS LLC**

and

THE TRACY FIRM

/s E. Todd Tracy

E. TODD TRACY

State Bar No. 20178650

E-Mail: TTracy@vehiclesafetyfirm.com

ANDREW G. COUNTS

State Bar No. 24036408

E-Mail: ACounts@vehiclesafetyfirm.com

WENDELL P. "CHIP" MARTENS, JR.

State Bar No. 24002528

E-Mail: CMartens@vehiclesafetyfirm.com

4701 Bengal Street

Dallas, Texas 75235

Telephone: (214) 324-9000

Fax: (972) 387-2205

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon all counsel of record on this the 13th day of April, 2020 in accordance with the Federal Rules of Civil Procedure.

/s/ Deron L. Wade

Deron L. Wade